

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
BEFORE THE UNITED STATES  
FEDERAL ELECTION COMMISSION  
2016 JUL 21 PM 3:21

Keep America Great PAC  
PO Box 36-20197  
New York, NY 10129  
(202) 630-9594

OFFICE OF GENERAL  
COUNSEL

v.

MUR # 7111

Donald J. Trump  
Donald J. Trump for President, Inc.  
725 Fifth Avenue, New York, NY 10022

COMPLAINT

1. DIRECT CORPORATE CONTRIBUTIONS TO CAMPAIGN This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that Donald J. Trump and Donald J. Trump for President, Inc. have not complied with the restrictions on federal campaign committees accepting corporate contributions, and that both parties are in violation of 52 U.S.C. §30118(a).
2. VOLUNTEER SERVICES THAT WERE COMPENSATED Additionally, this complaint is based on reason to believe that a volunteer of Donald J. Trump for President, Inc. is being separately compensated for services performed without donating their services to the campaign, in violation of FECA §100.74.
3. USE OF CORPORATE NAME OR TRADEMARK Additionally, this complaint is based on reason to believe that the Trump Organization is using its corporate name or trademark to facilitate the making of contributions to a federal campaign, and that Donald J. Trump for President, Inc. is in violation of FECA §114.2(d) and (f), and AO 2007- 10.

4. USE OF CORPORATE FACILITIES Additionally, this complaint is based on reason to believe that a volunteer of Donald J. Trump for President, Inc. has been using corporate facilities, and that the use of corporate facilities is likely not isolated or incidental, and that the corporation has not been compensated for this use, in violation of FECA §114.9(a) and (b).

5. VOLUNTEER TRANSPORTATION EXPENSES EXCEEDING LIMIT Lastly, this complaint is based on reason to believe that a volunteer of Donald J. Trump for President, Inc. volunteer has exceeded the limits placed on transportation expenses, in violation of FECA §100.79(a).

6. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission shall make an investigation of such alleged violation . . . ." 52 U.S.C. § 30109(a)(2); see also 11 C.F.R. § 111.4(a).

#### FACTS

7. On July 20th, 2016, Meredith McIver, identified as an in-house staff writer at the Trump Organization, issued a statement accepting fault for plagiarising Melania Trump's July 18th Speech at the 2016 Republican National Convention. McIver stated that she had worked with Melania Trump on her speech, and ultimately included her edits into what became the final draft that Melania Trump presented.<sup>1</sup>

8. The statement released by Meredith McIver was published on Trump Organization letterhead.<sup>2</sup>

9. In the statement, McIver said, "Yesterday, I offered my resignation to Mr. Trump and the Trump family, but they rejected it. Mr. Trump told me that people make innocent mistakes, and that we learn and grow from these experiences. I asked to put out this statement because I did not like to see the way this was distracting from Mr. Trump's historic campaign [.]"<sup>3</sup>

#### SUMMARY OF THE LAW

<sup>1</sup><http://www.nbcnews.com/storyline/2016-conventions/trump-staff-writer-takes-blame-melania-speech-n613366>

<sup>2</sup> <https://assets.donaldjtrump.com/MeredithStatement.pdf>

<sup>3</sup> <http://www.cnn.com/2016/07/20/politics/trump-aide-offers-resignation-in-melania-trump-plagiarism-incident/>

### **"Limits on Corporate Contributions to Federal Candidate Committees"**

10. "The Federal Election Campaign Act (the Act) prohibits corporations and labor organizations from using their general treasury funds to make contributions or expenditures in connection with federal elections. 52 U.S.C. §30118(a)"<sup>4</sup>

### **"Explanation of Personal Volunteer Services"**

11. "An individual may volunteer personal services to a campaign without making a contribution as long as the individual is not compensated by *anyone* for the services."<sup>5</sup> FECA §100.74.

### **"Use of Corporate Name"**

12. "A corporation or a labor organization may not use the corporation's names, trademarks or service marks to facilitate the making of contributions to a federal political committee, and a federal political committee may not knowingly accept or receive such facilitated contributions."<sup>6</sup> FECA 114.2(d) and (f), AO 2007- 10.

### **"Occasional, Isolated Use of Corporate Facilities"**

13. Employees of the corporation may make occasional, isolated, or incidental use of the facilities of a corporation for individual volunteer activity in connection with a Federal election. More than occasional use of the facilities requires the corporation to be reimbursed for the use of facilities at the normal and usual rental charge. More than occasional use of the corporate facilities has been defined as no more than one hour per week, or no more than four hours in one month. FECA §114.9, §100.52(d)(2).

### **"Limits on Amount Spent for Volunteer Transportation"**

14. Any unreimbursed payment for transportation expenses related to travel incurred by a volunteer shall not exceed \$1,000 per election, and \$2,000 in a calendar year. FECA §100.79

## **CAUSES OF ACTION**

<sup>4</sup> <http://www.fec.gov/pdf/colagui.pdf>, page 3.

<sup>5</sup> <http://www.fec.gov/pdf/candgui.pdf>, page 49.

<sup>6</sup> <http://www.fec.gov/pdf/candgui.pdf>, page 58

**COUNT 1:**

**There is reason to believe that Donald J. Trump for President, Inc. has been accepting corporate contributions from the Trump Organization**

15. There is reason to believe that Meredith McIver has been performing Donald J. Trump for President, Inc. campaign duties and is being compensated by the Trump Organization for those duties, and not by Donald J. Trump for President, Inc. If the Trump Organization has been paying the campaign salary of an employee of Donald J. Trump for President, Inc., then Donald J. Trump for President, Inc. has been accepting illegal contributions from the Trump Organization, a corporation.

**COUNT 2:**

**There is reason to believe that a volunteer of Donald J. Trump for President, Inc. has been accepting compensation for the personal services that they were volunteering for Donald J. Trump for President, Inc. without making a contribution to reflect those services**

16. There is reason to believe that while Meredith McIver was volunteering personal speech writing services to Donald J. Trump for President, Inc., she was also receiving compensation for those services by the Trump Organization, and further that she did not make a contribution to Donald J. Trump for President, Inc. to reflect that her services were no longer considered "volunteer" in light of the compensation.

**COUNT 3:**

**There is reason to believe that the Trump Organization has been using its corporate name to facilitate contributions to Donald J. Trump for President, Inc.**

17. In light of the campaign-related statement that Meredith McIver released on the Trump Organization's corporate letterhead, there is reason to believe that the Trump Organization is using its corporate name in other ways, and potentially is using its corporate name to facilitate contributions to Donald J. Trump for President, Inc.

**COUNT 4:**

**SECRET**

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Respectfully submitted,

Respectfully submitted,

**Verification**

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn to pursuant to 18 U.S.C. § 1001.

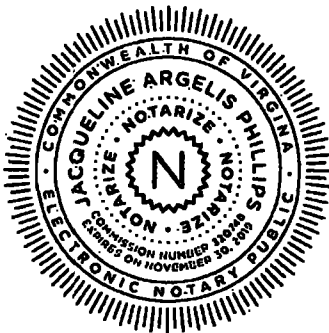
  
For Keep America Great PAC

Scott J. Dworkin

Commonwealth of VA Fauquier County

Sworn to and subscribed before me this 21 day of July, 2016.

  
Notary Public



100044511-1

# Notarize

Verify this document and the notarization at <https://verify.notarize.com//> with the following information:

Notarized date: 07/21/2016      Retrieval ID: CTR7DQMN      PIN: ZTV3W4

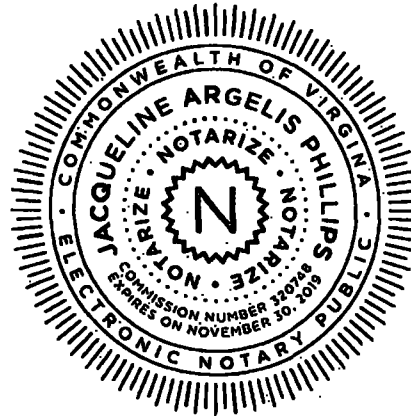
Customer's last name: Dworkin

*JA Phillips*

Jacqueline Argelis Phillips

Virginia Electronic Notary Public

Notary ID: #320748





## Notarize

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Electronic notarizations completed by Notarize offer an unprecedented level of verifiability. Notarize documents have a X509 security certificate enabling institutions to confirm the authenticity by opening a digital copy of the document in widely available programs like Adobe Acrobat. Institutions may retrieve a digital copy and, if ever a document is disputed, they may also verify the notarization by accessing a video recording of the transaction per the instructions on the preceding page.

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